UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

16-CR-389 (AKH)

JONA RECHNITZ,

Defendant.

NOTICE OF MOTION BY COOLEY LLP BE RELIEVED AS COUNSEL TO JONA RECHNITZ AND TO SEAL CERTAIN PAPERS IN SUPPORT OF THE MOTION

PLEASE TAKE NOTICE that, pursuant to Local Rule 1.4, upon the accompanying declaration of Nicholas Flath and the memorandum of law in support, Cooley LLP will move this Court before the Honorable Alvin K. Hellerstein, at the United States District Courthouse, Southern District of New York, 500 Pearl Street, New York NY 10007, for an order (a) relieving Cooley LLP as counsel for defendant Jona Rechnitz, and (b) sealing certain exhibits to the declaration of Alan Levine, Esq., in support.

Dated: New York, New York August 24, 2020 Respectfully submitted,

COOLEY LLP

By: /s Alan Levine

Alan Levine Nicholas Flath 55 Hudson Yards New York, NY 10001-2157 (212) 479-6000

TO: Jona Rechnitz 9533 Sawyer Street Los Angeles, CA 90035

Assistant US Attorney Martin Bell (via ECF)

Christopher J. Gunther, Esq. (via ECF)

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent to those indicated as non-registered participants on the above date.

COOLEY LLP

By: //s//Nicholas A. Flath
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